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July 17, 1991

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Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Attention: David R. Siddall
Chief, Frequency Allocation Branch
Office of Engineering and Technology

Re: Petition of the American Radio Relay League for
Secondary Allocation at 216-220 MHz,
RM-7747

Dear Ms. Searcy:

On behalf of Waterway Communications System, Inc. (WATERCOM), we respectfully request a postponement of the due date of comments with regard to the petition of the American Radio Relay League, Inc., regarding a secondary allocation of the 216-220 MHz band for the amateur service, RM-7747. The extension requested herein would defer the comment due date from July 25, 1991 until October 23, 1991.

WATERCOM, as the Commission is aware, is the licensee of the Automated Maritime Telecommunications System (AMTS), which operates in the 216-220 MHz band. WATERCOM's network operates along the inland waterways providing service from Minneapolis/St. Paul, Chicago and Pittsburgh to New Orleans and along the Gulf Intracoastal Waterway from the Texas/Mexico border to the Florida Panhandle. WATERCOM, accordingly, has an abiding interest in the use of the 216-220 MHz band. The

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extension requested herein is desired in order to permit WATERCOM to conduct engineering analysis of the ARRL proposal, specifically directed toward the interference potential toward the AMTS. Thereafter, it is the intent of WATERCOM to meet with the ARRL and attempt to develop mutually acceptable technical standards responsive to the ARRL petition.

Counsel for the ARRL has been apprised of the foregoing, and has represented that his client will NOT interpose an objection to this request.

Your consideration of the foregoing is very much appreciated.

Very truly yours,



Martin W. Bercovici

Counsel to Waterway
Communications System, Inc.

cc: David R. Siddall
Robert H. McNamara
Christopher D. Imlay